

Kym Samuel Cushing, Esq.
Nevada Bar No. 4242
Douglas M. Rowan, Esq.
Nevada Bar No. 4736
WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP
300 South Fourth Street, 11th Floor
Las Vegas, Nevada 89101
(702) 727-1400; FAX (702) 727-1401
kym.cushing@wilsonelser.com
douglas.rowan@wilsonelser.com
Attorneys for Defendant Target Corporation

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Maria S. Martinez, individually;

Plaintiff,

vs.

Target Corporation; and DOES 1 through 100; and
ROE CORPORATIONS 101 through 200,

Defendants.

CASE NO.: 2:15-cv-00353-JCM-GWF

STIPULATION FOR EXTENSION OF DISCOVERY DEADLINES

(First Request)

The above named parties, by and through their respective counsel of record, hereby submit the following STIPULATION FOR EXTENSION OF DISCOVERY DEADLINES (First Request).

A. DISCOVERY COMPLETED TO DATE

On April 1, 2015, the parties held an initial Rule 26(f) Conference. Defendant's initial disclosure of documents and witnesses was made on March 31, 2015. Plaintiff's initial disclosure of documents and witnesses was made on April 1, 2015. The Court approved the parties' Stipulated Discovery Plan/Scheduling Order on April 15, 2015.

Plaintiff has responded to Interrogatories and Requests for Production served by Defendant. Defendant has responded to Interrogatories and Requests for Production served by Plaintiff. Defendant has requested Plaintiff's medical records directly from her medical providers through records authorizations provided by Plaintiff.

1 **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

2 Defendant is still obtaining medical records regarding Plaintiff through HIPAA
3 authorizations provided by Plaintiff. Defendant needs to conduct the depositions of Plaintiff and
4 Plaintiff's treating healthcare providers. Defendant anticipates conducting the depositions of two or
5 three of Plaintiff's treating healthcare providers once Defendant has received Plaintiff's medical
6 records directly from the providers. Defendant may also conduct the deposition of Plaintiff's
7 husband, who was a witness to the subject incident. Defendant anticipates conducting those
8 depositions within the next sixty to ninety days, depending upon how quickly Defendant receives the
9 medical records. Defendant may also seek to have Plaintiff appear for a Rule 35 examination.

10 Plaintiff may conduct the depositions of certain employees and representatives of Defendant.
11 Defendant will be supplementing its responses to Plaintiff's written discovery requests upon the
12 entry of a stipulated protective order in this matter.

13 The parties also anticipate designating expert witnesses and conducting the depositions of the
14 designated experts.

15 **C. REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED**

16 Defendant only recently received the executed medical records authorizations from Plaintiff
17 and is in the process of obtaining Plaintiff's records. Defendant needs to obtain those records before
18 conducting the depositions of Plaintiff and her treating healthcare providers. Defendant also needs
19 to obtain those records to provide to a medical expert in order to allow for the completion of an
20 expert report prior to the deadline for initial expert witness disclosures. Defendant granted Plaintiff
21 extensions to respond to Defendant's written discovery requests and only recently received the
22 responses.

23 Defendant does not believe that the records can be obtained, the depositions conducted, and
24 expert reports completed prior to the current initial expert disclosure deadline.

25 Accordingly, the parties request a sixty day extension of the current discovery deadlines.

26 **D. PROPOSED DISCOVERY SCHEDULE**

27 Close of Discovery:	October 26, 2015
28 Dispositive Motions:	November 25, 2015
Joint Pre-Trial Order:	December 28, 2015
Last day to amend pleadings:	Closed

Initial Expert Disclosures:
Rebuttal Expert Disclosures:
Interim Status Report

August 27, 2015
September 26, 2015
August 27, 2015

DATED this 2nd day of June, 2015.

DATED this 1st day of June, 2015.

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

BERNSTEIN & POISSON

BY: [Signature]

Kym Samuel Cushing, Esq.
Nevada Bar No. 004242
Douglas M. Rowan, Esq.
Nevada Bar No. 004736
300 South Fourth Street, 11th Floor
Las Vegas, Nevada 89101
Attorneys for Defendant Target Corporation

BY: [Signature]

Jessica M. Munoz, Esq.
Nevada Bar No. 012610
700 South Jones Boulevard
Las Vegas, NV 89107
Attorney for Plaintiff
Maria S. Martinez

IT IS SO ORDERED.

Dated this 3rd day of June, 2015.

[Signature: George Foley Jr.]
UNITED STATES MAGISTRATE JUDGE